

and (b)(1)(C), as to the defendant, KEVIN ADKINS, and in violation of Title 21, United States Code, Sections 841(a)(1), and (b)(1)(C) as to defendants DARRELL MASSINGILLE, TAMMY PARSONS, and JACK MORGAN.

MANNER AND MEANS OF THE CONSPIRACY

A. It was part of the conspiracy that KEVIN ADKINS received and sold heroin to various individuals.

B. It was further part of the conspiracy that KEVIN ADKINS supplied heroin to DARRELL MASSINGILLE or relied on DARRELL MASSINGILLE to arrange for meetings with various individuals where ADKINS and MASSINGILLE could sell heroin and fentanyl to them.

C. It was further part of the conspiracy that KEVIN ADKINS also relied on TAMMY PARSONS to arrange for meetings with various individuals where ADKINS and PARSONS could sell heroin to them.

D. It was further part of the conspiracy that KEVIN ADKINS supplied heroin to JACK MORGAN, who trafficked in these drugs to other individuals.

E. It was further part of the conspiracy that KEVIN ADKINS provided a telephone to JACK MORGAN to use to further this conspiracy.

F. It was further part of the conspiracy that KEVIN ADKINS and JACK MORGAN possessed firearms and ammunition to further this conspiracy.

G. It was further part of the conspiracy that KEVIN ADKINS used JACK MORGAN's driveway to conduct drug transactions.

H. It was further part of the conspiracy that KEVIN ADKINS conducted counter-surveillance of law enforcement.

I. It was further part of the conspiracy that the co-conspirators conducted drug trafficking activity by using cellular telephones to make and receive telephone calls and to send and receive text or other electronic messages.

J. It was further part of the conspiracy that the co-conspirators, when using cellular phones or text messaging to conduct drug trafficking activity, used slang terms, street terminology, or code words or phrases to obscure and to disguise the true nature of their activities and the true meaning of their conversations.

ACTS IN FURTHERANCE OF THE CONSPIRACY

In furtherance thereof, and to effect the goals and conceal the existence of the conspiracy, the defendants and others performed acts in furtherance of the conspiracy in the Northern District of Ohio and elsewhere, including but not limited to the following:

1. On or about March 15, 2016, at approximately 11:57 p.m., an unidentified female (UF) called JACK MORGAN. The UF asked, "Did you get a hold of Frank?" MORGAN replied, "No." The UF asked, "Then what are you doing?" MORGAN replied, "Nothing. I had to stop over Donny's and pick up some primer." The UF said, "There ain't no way no one can sit with you." MORGAN said, "I don't need nobody. I got my pistol, f**k it, what happens, happens." The UF asked, "How long its going to take you to fix that?" MORGAN replied, "It will take me about five hours." The UF said, "What?" MORGAN replied, "I'll probably be in bed about five o'clock in the morning. Let me grab this primer. I'll call you right back."

2. On or about March 16, 2016, at approximately 12:16 a.m., an unidentified male (UM) called KEVIN ADKINS. During the conversation, the UM asked, "What you been into?"

ADKINS replied, "Sh*t, Cuz, I've been chilling. Shi*t." The UM said, "Got some trob, man." ADKINS responded, "I've staying my ass in my house, for real." The UM asked, "Where them phones at?" ADKINS replied, "Sh*t, I got 'em." The UM replied, "One of them down man." ADKINS said, "Sh*t, I done got rid of 'em for real, I only got one now, man. I've slowing ma' sh*t all the way down." The UM said, "Take me to the nose, man. Let me in, put me in position." ADKINS responded, "Uh...yeah?" The UM replied, "Yeah." ADKINS said, "Man, it might be too much for you, man." The UM replied, "I f**k it, ni**a what?" ADKINS laughed and said, "You be gone all day long, cuz." The UM replied, "Man." ADKINS continued, "You've been in the car, ni**er." The UM said, "What the f**k is wrong with you, ni**er? How you shop?" ADKINS replied, "Alright, bi**h." The UM continued, "Hey, hey ni**a, that's what the f**k I'm talking about. Put me in a position, though. Hey, listen though, I call you, I need you for something else." ADKINS replied, "What's up?" The UM replied, "I wanna go hit'em with a buck-a-roo." ADKINS asked, "What?" The UM replied, "Your man, but my man's coming tomorrow." ADKINS said, "He hit you with the connects bag, huh?" The UM said, "Yeah, man (ui) buck-a-roo." ADKINS said, "I told you." The UM asked, "Hey, man. Do we?" ADKINS replied, "All of the players talking about him right now, all of 'em. That's why I ain't. He's been going around telling them I don't f**k with it no more, and the feds on me, like couldn't buy papers out on the ni**er with the players, damn." The UM responded, "Hey, where he, you know where he's staying?" ADKINS said, "Yeah, I know where he is staying, I mean, you know. I got the whole run down on that ni**." The UM asked, "Do he still stay there?" ADKINS said, "Yes. Not a, not a, not at the one spot that he, you know. He got another spot." The UM replied, "Hey, I need you at least to take me there, give me the ride back, and I get the address, I do the rest." ADKINS said, "I'll play. They're down, right downstairs, they live in the same house."

The UM asked, "They're what?" ADKINS replied, "C'mon cuz, I just left, by like twenty (20) minutes ago, I just left. When I was there, he wa'nt (wasn't), his car wasn't there. He wa'nt (wasn't) there, but yeah, anyhow, that's where he now lay his head at. He be trying to fake like that bi**h Trent, but that's where he lay his head at, that ni**a can't fool me. 'Cause he in still in the Heights." The UM said, "This ni**er taken nobody there, is me then." ADKINS replied, "Uh-huh, but he be trying, he be trying to play it like, like, that's his, that's his trap. Man, who the f**k trapping at the Heights? Man, you can't fool me." Later in the conversation, the UM asked, "You think is in there?" ADKINS replied, "I think." The UM replied, "I'm in that bi**h." ADKINS said, "Know, where is at?" The UM asked, "You know where is at in there?" ADKINS replied, "I don't know where is, no, hell nah." The UM said, "I just." ADKINS continued, "Know where the spot at." The UM responded, "Yeah, get me in there. I'm, man let the. Hey, what you doing tomorrow?" ADKINS replied, "Nothing." The UM said, "Hey, I'm a, I'm a pull out for you tomorrow, man." ADKINS replied, "Sh*t, just call me when you come out, I'm ... man." The UM asked, "Where you at?" ADKINS replied, "West side, on Madison." The UM asked, "Are you over there?" ADKINS replied, "Yeah." The UM said, "Alright then, cause I'm going to holler at you in person." ADKINS responded, "Pull up."

3. On or about July 14, 2015, DARRELL MASSINGILLE and KEVIN ADKINS met with an undercover agent (UC) and sold the UC approximately 28.35 grams of heroin for approximately \$2,800.00. During the course of arranging for this sale of heroin, MASSINGILLE and the UC discussed ADKINS as follows: MASSINGILLE said, "He's (ADKINS) in Garfield, he got scared, cuz I told him I was gonna go around the corner, now he's like man, what the f**k you mean, now you're not gonna come around the corner, so he's gonna send someone else." The UC replied, "I mean." MASSINGILLE continued, "I don't do anything

like that, that big, like that.” The UC said, “You know what, I don’t know you, you don’t know me, I don’t want to be ripped off, and I know you don’t want to be ripped off, it’s the first time.” MASSINGILLE responded, “And the thing is, he don’t want me to just take it cuz you can do anything to it he said. You know I can, I don’t know how to do it, but he can do anything to it.” The UC replied, “This is business man, I got to get this cuz my guy’s out. Is this gonna come in one chunk?” MASSINGILLE replied, “Yeah.” The UC asked, “Not cut up?” MASSINGILLE replied, “That’s what I told him.” The UC continued, “It ain’t gonna be stepped on?” MASSINGILLE replied, “I know the coke comes hard like that, so that sh*t I imagine come the same way...it will be one chunk. He said he’s coming from Garfield Heights, not Rockside...I’m gonna have him pull up there, I’ll grab it, I’ll run over there and come here.” The UC said, “I’ll weigh it, pay you the money.” MASSINGILLE responded, “It’s one hundred a gram, that’s kind of high.”

4. On or about July 30, 2015, DARRELL MASSINGILLE met with an undercover agent (UC) and sold the UC approximately 56 grams of heroin for approximately \$5,100. Prior to this sale of heroin, MASSINGILLE called ADKINS, who supplied MASSINGILLE with the heroin for this sale. In the course of arranging for the sale of this heroin the following conversation regarding Adkins occurred on or about July 30, 2015. The UC asked, “What did he say? How much?” MASSINGILLE replied, “Well last time you got, cuz it was twenty five, he (ADKINS) already said if you can do twenty six, twenty six.” The UC said, “There’s five grand there.” MASSINGILLE responded, “Alright, he just ain’t gonna be able to give me some... last time he didn’t give me sh*t.” The UC replied, “I’ll give you a hundred.” MASSINGILLE replied, “That’s cool, cuz he gonna give me a hundred on each one.” The UC asked, “Am I

gonna deal with him for now on?” MASSINGILLE replied, “Yeah, next time, he said when you call, you guys can hook up at Steel Yard, get something to eat.”

5. On or about September 15, 2015, DARRELL MASSINGILLE met with an undercover agent (UC) and sold the UC approximately 28.35 grams of heroin for approximately \$2,800.

6. On or about October 16, 2015, TAMMY PARSONS and KEVIN ADKINS met with an undercover agent (UC) and sold the UC approximately 28.35 grams of heroin for approximately \$2,800. During this transaction, the UC also paid PARSONS for supplying the UC with ADKINS' telephone number.

7. On or about November 3, 2015, KEVIN ADKINS met with an undercover agent (UC) and sold the UC approximately 56.7 grams of heroin for approximately \$5,100. During the course of the sale of this heroin, the following conversation took place: The UC said, “Thanks for going back and getting that for me.” ADKINS replied, “Yeah man, you said you’re gonna be gone for a while.” The UC said, “Yeah, yeah, not the regular two weeks.”

8. On or about December 8, 2015, KEVIN ADKINS met with an undercover agent (UC) and sold the UC approximately 28.35 grams of heroin for approximately \$2,500.

9. On or about December 9, 2015, DARRELL MASSINGILLE met with an undercover agent (UC) and sold the UC approximately 28.35 grams of heroin for approximately \$2,500. MASSINGILLE was supplied with this heroin by ADKINS. In the course of this sale of heroin, the following conversation occurred between MASSINGILLE and the UC.

MASSINGILLE said, “I don’t like talking on the phone... I just want to hook you, after this time, why don’t we just go to ‘Foot’ (phonetic spelling of unidentified male.) Then we won’t have to deal, they are already sent that dude Kevin, they’re being paranoid... ‘Foot’s’ an older dude, you

know what I'm saying, he's more down to earth, he won't care if I come to him once or twice with you and hook you guys up, he's smart, he's about his money, if you're buying that much... after one or two times I'll be able to hook you guys up (referring to Confidential Source #1 and the UC)." The UC said, "Let's do this with your girl... Kevin's (Adkins) your guy but f**k it, if he's gonna be late all the time...yesterday, I bought one from him yesterday and waited an hour and a half." MASSINGILLE replied, "I talked to 'Foot' yesterday, he'll be back Thursday, and dude, like I said, his sh*t is hard as this f**king thing (knocks on dashboard) but he won't f**k with nothing but an ounce or up.... We'll go to his shop, he has a shop... he does welding and sh*t... Greg (unknown individual) got four years in jail. Yeah that's him, that's Kev (ADKINS). He's always got different cars." The UC replied, "I just got some from him yesterday... It's twenty five man...your girl introduced me." MASSINGILLE responded, "He didn't say anything to me."

10. On or about January 4, 2016, KEVIN ADKINS sent the following text message to the UC: "What's up bro this is Kev." The UC replied, "Tried callin cupl times d told me you got new number I got you locked in now call you later this week to hook up." ADKINS responded, "Ok just call me when u ready."

11. On or about January 22, 2016, KEVIN ADKINS met with an undercover agent (UC) and sold the UC approximately 28.35 grams of heroin for approximately \$2,500. Prior to this sale of heroin, an investigator, using the UC's telephone number, sent the following text to ADKINS: "Kev you round need one." ADKINS sent a text message back, asking "how many". The UC (investigator) responded, "1." ADKINS replied, "ok 45min".

12. On or about February 11, 2016, an investigator using the UC's telephone number, sent a text message to KEVIN ADKINS, stating "Kev its (UC's first name) I will be back in

town in few days ... you on... will need to grab one.” ADKINS responded via text message, “Okay that’s cool just let me know when you ready bro.”

13. On or about February 12, 2016, an investigator using the UC’s telephone number, sent a text message to KEVIN ADKINS, stating, “Kev change of plans I’ll be back in Monday. Still cool to hit you up for one then?” ADKINS responded via text message that same day, “Okay.”

14. On or about March 3, 2016, at approximately 8:51 p.m., JACK MORGAN called an unidentified female (UF). The UF asked, “What’s up with your other number?” MORGAN replied, “My other number, I get incoming calls, I broke the phone, I can’t dial out on it.” The UF asked, “What’s up?” MORGAN asked, “Can you come by for four?” The UF said, “Four Forties.”

15. On or about March 4, 2016, at approximately 11:36 p.m., JACK MORGAN called an unidentified female (UF). MORGAN asked, “Can you come by?” The UF asked, “Who is this?” MORGAN replied, “J.” The UF said, “I’m all the way on, uh, Superior. I’m about to come back that way in, like, 10 minutes. What was you trying to do?” MORGAN replied, “Probably like 30.” The UF said, “Okay. I’ll call you. In like 10.”

16. On or about March 5, 2016, at approximately 5:33 p.m., JACK MORGAN called DARRELL MASSINGILLE. MORGAN asked, “What’s up, Darrell, where the f**k you at, bro?” MASSINGILLE replied, “I’m at home.” MORGAN said, “Oh, let me see, let me see, you got any more ‘crack?’ ” MASSINGILLE replied, “I might, I might have a little bit. What did you say?” MORGAN replied, “I need some Ginzo. I’ll be over there in a second, like two f**king, three minutes.”

17. On or about March 5, 2016, at approximately 5:38 p.m., JACK MORGAN called an unidentified female (UF). MORGAN asked, "Can you come see me right here on Union?" The UF asked, "On where?" MORGAN replied, "Union. Remember where you (unintelligible)." The UF asked, "What you trying to do?" MORGAN replied, "School used to be? A dime. If you can." The UF said, "Alright. Give me, like, ten minutes."

18. On or about March 5, 2016, at approximately 11:05 p.m., JACK MORGAN called an unidentified male (UM). The UM asked, "Yeah, what you wanted? MORGAN replied, "You know, maybe a 30 or something. 20, 30." The UM said, "Make sure you have the cash right, fool."

19. On or about March 7, 2016, at approximately 11:00 p.m., an unknown male (UM) called KEVIN ADKINS. During the conversation, the UM asked, "What you got?" ADKINS replied, "Three." The UM's response was unintelligible (ui). ADKINS said, "Mm-hum." The UM responded, "... Jack?" ADKINS said, "Mm-hum." The UM asked, "Trying, uh...going in on something?" ADKINS said, "What?" The UM said, "That same thing you had?" ADKINS replied, "Gravy?" The UM said, "Yeah." ADKINS asked, "How much?" The UM replied, "Three twenty five (325). It's a full nickel though." ADKINS responded, "Uh... Yeah, we can (ui). The UM said, "But, we gotta do it ASAP. I don't wanna get rid of that bitch on some broke sh*t." ADKINS asked, "Three-seventy five (375)?" The UM replied, "No. Three-Twenty five (325)." ADKINS later asked, how much is that?" The UM replied, "Huh? What? What, What?" ADKINS asked, "One 0-Sixty (1,060)?" The UM replied, "Yeah."

20. On or about March 7, 2016, KEVIN ADKINS met with an undercover agent (UC) and sold the UC approximately 28.35 grams containing a mixture of heroin and fentanyl for approximately \$2,800.

21. On or about March 9, 2016, at approximately 2:52 p.m., an unknown female (UF) called ADKINS. During the conversation, the UF said, "Kevin?" ADKINS replied, "Yeah." The UF asked, "You even...you ever seen meth before?" ADKINS replied, "Uh-huh." The UF said, "You did?" ADKINS said, "Yeah." The UF said, "I...you know these guys were getting robbed yesterday, [inhales] went (unintelligible or ui), went to take (ui) to get his...back to get his phones. [Inhales] and they dropped it this stuff. Do you think? Oh...I...okay. Bye. You finna pull up...."

22. On or about March 9, 2016, at approximately 5:39 p.m., ADKINS called an unknown male (UM). During the conversation, the UM asked, "Where you at?" ADKINS replied, "I'm leaving from downtown. Oh, but, oh, this why I call you, for real though. Uh...got a g, a gram note." UM asked, "For what? Who is it?" ADKINS' response was unintelligible (ui). The UM said, "I'm giving you (ui)." ADKINS replied, "(ui). Sh*t. I don't give a f**k what you give him. Just make it look right." The UM later asked, "Oh, you charging eighty (80)?" ADKINS replied, "Yeah. That's why, when they call me, I give just them (ui) like point eight (.8). The UM later stated, "Alright, where you want me? I'm a meet you at Jack's." ADKINS replied, "Alright."

23. On or about March 10, 2016, at approximately 6:32 p.m., an unknown male (UM) called ADKINS. During the conversation, the UM asked, "Where you at, Kev?" ADKINS replied, "On Broadway." The UM said, "Someone told me the vice got you." ADKINS said, "Yeah, it just pulled me over." The UM asked, "Did he let you go?" ADKINS replied, "Yeah, it let me go. ...They took her out to jail." UM later asked, "You got to give up that car now?" ADKINS replied, "Yeah. I'm taking me to (unintelligible) ASAP, man. And is the same police, the same exact one, man."

24. On or about March 10, 2016, at approximately 6:58 p.m., KEVIN ADKINS had a conversation with an unknown male (UM) wherein ADKINS told the UM that the police had stopped ADKINS for littering. ADKINS indicated that his passenger was arrested for having needles and a pipe in her purse. The UM asked ADKINS who he had called about being stopped, and ADKINS said that he did not call anybody. In the course of the conversation, ADKINS told the UM that he was severing ties with a third party. ADKINS said that the third party had a "Fetty-Walker" (fentanyl) supply and that ADKINS was unaware of it. The UM told ADKINS that he had another pipeline for ADKINS. ADKINS said, "But the crazy thing about it though, before this, Ni**a, he had the fettiwalk [fentanyl] and didn't even know it. I don't even think her knew they had it and it was... it was knocking 'em out. Ni**a, I went back, it's over with." The UM said, "Hum... hum... hum... hum...." ADKINS continued, "That's why we in... at the [ui] right on another ni**a, I was in there talking to him about that this, he like, 'Hell no, no it wan't.' 'Ni**a what, you don't know what the f*ck that sh*t is? [ui] with the fettiwalk (fentanyl),' he and he was, 'That sh*t was gas.' Like, uh. I pulled like five of them to the side and [ui] give it to him like that and he was knocking they ass out. Even one of them went to the hospital. He...." ADKINS continued, "... ain't called me since." The UM replied, "Hum... hum... hum... hum... But D, I got another party line for you." ADKINS said, "Man, somethin' gotta give, man." The UM said, "I got you say no more. Say no more, we gonna be aight. We just gonna go together." ADKINS responded, "Sh*t, I'm low, I'm about ready for real." The UM replied, "All right sh*it, I'm... we just gonna have to go, you feel me?" ADKINS said, "Sh*t...." The UM continued, "Stay out the way, man." The UM continued, "For real, stay out the way, man." ADKINS replied, "Sh*t, I'm chilling ni**a. I just bought me a bottle, I'm about to go sit down

somewhere, man.” The UM said, “Oh, alright.” ADKINS replied, “I’m getting with you though.” The UM said, “All right.” ADKINS said, “All right, cuz.”

25. On or about March 16, 2016, KEVIN ADKINS possessed approximately 8.9 grams of heroin.

All in violation of Title 21, United States Code, Section 846.

COUNT 2

The Grand Jury further charges:

On or about July 14, 2015, in the Northern District of Ohio, Eastern Division, KEVIN ADKINS and DARRELL MASSINGILLE did knowingly and intentionally distribute approximately 28 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 3

The Grand Jury further charges:

On or about July 30, 2015, in the Northern District of Ohio, Eastern Division, KEVIN ADKINS and DARRELL MASSINGILLE did knowingly and intentionally distribute approximately 56 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 4

The Grand Jury further charges:

On or about September 15, 2015, in the Northern District of Ohio, Eastern Division, KEVIN ADKINS and DARRELL MASSINGILLE did knowingly and intentionally distribute

approximately 28 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 5

The Grand Jury further charges:

On or about October 16, 2015, in the Northern District of Ohio, Eastern Division, KEVIN ADKINS and TAMMY PARSONS did knowingly and intentionally distribute approximately 28 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 6

The Grand Jury further charges:

On or about November 3, 2015, in the Northern District of Ohio, Eastern Division, KEVIN ADKINS did knowingly and intentionally distribute approximately 56 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 7

The Grand Jury further charges:

On or about December 8, 2015, in the Northern District of Ohio, Eastern Division, KEVIN ADKINS did knowingly and intentionally distribute approximately 28 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 8

The Grand Jury further charges:

On or about December 9, 2015, in the Northern District of Ohio, Eastern Division, KEVIN ADKINS and DARRELL MASSINGILLE did knowingly and intentionally distribute approximately 28 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

COUNT 9

The Grand Jury further charges:

On or about January 22, 2016, in the Northern District of Ohio, Eastern Division, KEVIN ADKINS did knowingly and intentionally distribute approximately 28 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 10

The Grand Jury further charges:

On or about March 7, 2016, in the Northern District of Ohio, Eastern Division, KEVIN ADKINS did knowingly and intentionally distribute approximately 28 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 11

The Grand Jury further charges:

On or about March 16, 2016, KEVIN ADKINS did knowingly and intentionally possess with the intent to distribute approximately 8.29 grams of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841 (a)(1) and (b)(1)(C).

COUNT 12

The Grand Jury further charges:

On or about March 16, 2016, in the Northern District of Ohio, Eastern Division, JACK MORGAN, who had been convicted of a misdemeanor crime of domestic violence, to wit: Attempted Domestic Violence in violation of Ohio Revised Code Sections 2323.02 and 2919.25, a fifth degree felony, in Cuyahoga County Court of Common Pleas case number CR-08-514116 on or about November 12, 2008, did knowingly possess in and affecting interstate or foreign commerce, ammunition, that is, four (4) 12 gauge shot gun shells; one (1) .45 caliber rounds; one (1) .380 caliber round; six (6) 30-30 caliber rounds; and two (2) .22 caliber long rounds, in violation of Title 18, Sections 922(g)(9) and 924(a)(2), United States Code.

COUNTS 13-22

The Grand Jury further charges:

On or about the dates and approximate times listed below, in the Northern District of Ohio, Eastern Division, and elsewhere, the defendants listed below did knowingly and intentionally use a communication facility, to wit: a telephone, to facilitate acts constituting a felony under Title 21, United States Code, Section 846:

Count	Defendants	Date	Time
13	DARRELL MASSINGILLE	July 14, 2015	10:40 a.m.
14	DARRELL MASSINGILLE	July 14, 2015	1:48 p.m.
15	DARRELL MASSINGILLE	September 15, 2015	12:00 p.m.
16	DARRELL MASSINGILLE	September 15, 2015	12:10 p.m.
17	TAMMY PARSONS	October 16, 2015	11:00 a.m.
18	KEVIN ADKINS	March 7, 2016	7:11 p.m.
19	KEVIN ADKINS	March 9, 2016	5:39 p.m.
20	KEVIN ADKINS	March 9, 2016	5:42 p.m.
21	KEVIN ADKINS and JACK MORGAN	March 10, 2016	1:29 p.m.
22	KEVIN ADKINS and JACK MORGAN	March 10, 2016	1:54 p.m.

All in violation of Title 21, United States Code, Section 843(b).

FORFEITURE

The Grand Jury further charges:

For the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853, the allegations of Counts 1 through 22 are incorporated herein by reference. As a result of the foregoing offenses, KEVIN ADKINS, DARRELL MASSINGILLE, TAMMY PARSONS, and JACK MORGAN shall forfeit to the United States any and all property constituting, or derived from, any proceeds they obtained, directly or indirectly, as the result of such violations; and any and all of their property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations; including, but not limited to the following: \$8,860.00 in U.S. Currency.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.